



# City of Seattle

Gregory J. Nickle, Mayor

## Seattle Transportation

Grace Crunican, Director

DEPT. OF TRANSPORTATION  
COUNTS

245142

May 23, 2003

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Docket Management Facility (USCG -2001-10881) - 11  
U. S. Department of Transportation  
Room PL-401  
400 Seventh Street SW  
Washington, D. C. 29590-001

Dear Sir or Madam,

The City of Seattle Department of Transportation (SDOT) does not support the proposed amendment to drawbridge operations regulations as described in 33 CFR section 117.35 (a) (3), requiring 90 days notification period for scheduled maintenance on drawbridges.

This amendment would cause a variety of problems for SDOT.

- It would cause difficulties in contracting with private companies for repair work. The bid process, awarding the contract, and issuing a notice to proceed with the work is significantly influenced by the contractor's schedule. Many contractors will find the 90-day notification rule too onerous and will not participate in bidding for the work. This could create a serious delay in making the required repairs.
- The amendment would cause problems with scheduling maintenance work that needs to be done as soon as possible, but cannot legitimately be called an emergency
- The amendment would cause problems mobilizing crews and necessary equipment due to other maintenance work demands
- The amendment would interfere with other scheduled necessary maintenance work

The current 30-day notification period has been long established and our understanding is that it is not causing any problems with local mariners. We most strongly urge you to reconsider your proposal and withdraw it from consideration.

Thank you for the opportunity to comment on this important matter.

Respectfully,

David E. Chew  
Bridge and Structures Maintenance and Operations Manager

Cc: Austin Pratt , USCG Bridge Section, 13<sup>th</sup> Coast Guard District